

FILED

NOV 03 2016

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

DAVID CREWS, CLERK
BY *[Signature]* Deputy

UNITED STATES OF AMERICA
v.

CRIMINAL NO: 4:16 CR 116

KEITH WILLIAMS, a/k/a, "Keke"
DANNY TURNER, a/k/a "Young"
BRIAN JOHNSON
COREY JOHNSON, a/k/a "Cool"
MARQUEL MILES, a/k/a "Boo"
JOSEPH WEEKS
CURTIN SMITH
ELANA GADDY
RACHAEL PARTAIN
CONSTANCE MOORMAN
ROOSEVELT WALTON, a/k/a "Ro"

21 U.S.C. § 841
21 U.S.C. § 846

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Conspiracy to Distribute Heroin
21 U.S.C. § 846

Beginning at a date unknown unknown to the Grand Jury, but beginning on or about July 1, 2015 and continuing until at least October 2016, in the Northern District of Mississippi and elsewhere, the defendants, KEITH WILLIAMS, a/k/a "Keke", DANNY TURNER, a/k/a "Young", BRIAN JOHNSON, COREY JOHNSON, a/k/a "Cool", MARQUEL MILES a/k/a "Boo", JOSEPH WEEKS, CURTIN SMITH, ELANA GADDY, RACHAEL PARTAIN, CONSTANCE MOORMAN, and ROOSEVELT WALTON, a/k/a "Ro", did unlawfully, knowingly and intentionally combine, conspire, and agree with each other, and with persons both known and unknown to the Grand Jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), all in violation of Title 21, United States Code, Section 846.

Goal of the Conspiracy

It was the primary purpose and object of the conspiracy to establish a heroin distribution network, which would obtain and subsequently distribute heroin in the Northern District of Mississippi, and elsewhere, in an effort to obtain as much money as possible. The main task of this drug trafficking network was to acquire and distribute a continuous supply of heroin to customers of the network.

Manner and Means to Accomplish the Conspiracy

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. It was part of the conspiracy that KEITH WILLIAMS, a/k/a "Keke", DANNY TURNER, a/k/a "Young", BRIAN JOHNSON, COREY JOHNSON, a/k/a "Cool", MARQUEL MILES, a/k/a "Boo", JOSEPH WEEKS, CURTIN SMITH, ELANA GADDY, RACHAEL PARTAIN, CONSTANCE MOORMAN, and ROOSEVELT WALTON, a/k/a "Ro", and others, would and did distribute and possess with intent to distribute heroin in the Northern District of Mississippi and elsewhere, thereby acquiring sums of money.

2. It was part of the conspiracy that the defendants would and did play different roles in the conspiracy, take upon themselves different tasks, and participate in the conduct of the drug trafficking network through various criminal acts. The defendants made themselves and their services available at various times throughout the conspiracy and participated in certain drug trafficking ventures as required to promote and protect the distribution operation.

3. It was further part of the conspiracy that co-conspirators would correspond with each other and with other heroin traffickers in Tennessee and Mississippi, among other places, to arrange the purchase and shipment of large quantities of heroin into the Northern District of Mississippi, and elsewhere.

4. It was further part of the conspiracy that heroin was prepared, packaged and/or stored, prior to distribution to buyers, in co-conspirators' premises, known as "stash houses." Co-conspirators used these "stash houses" to avoid detection by law enforcement authorities.

5. It was further part of the conspiracy that co-conspirators transported and distributed heroin to buyers in the Northern District of Mississippi, and elsewhere.

6. It was further part of the conspiracy that co-conspirators counted, transported and stored currency derived from the sale of controlled substances.

7. It was a further part of the conspiracy that co-conspirators used telephones, including cell phones, to facilitate their illegal narcotics business; that is by making telephone calls to communicate with each other, with suppliers, and with customers.

All in violation of 21 United States Code, Section 846.

COUNT TWO

On or about May 3, 2016, in the Northern District of Mississippi, defendant ROOSEVELT WALTON, a/k/a "Ro", did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT THREE

On or about May 10, 2016, in the Northern District of Mississippi, defendant ROOSEVELT WALTON, a/k/a "Ro", did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT FOUR

On or about May 13, 2016, in the Northern District of Mississippi, defendant BRIAN JOHNSON, did unlawfully, knowingly and intentionally distribute a mixture and substance

containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT FIVE

On or about May 25, 2016, in the Northern District of Mississippi, defendant ROOSEVELT WALTON, a/k/a "Ro", did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT SIX

On or about June 13, 2016, in the Northern District of Mississippi, defendant ROOSEVELT WALTON, a/k/a "Ro", did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT SEVEN

On or about June 29, 2016, in the Northern District of Mississippi, defendant DANNY TURNER, a/k/a "Young", did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT EIGHT

On or about July 5, 2016, in the Northern District of Mississippi, defendant DANNY TURNER, a/k/a "Young", did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT NINE

On or about July 8, 2016, in the Northern District of Mississippi, defendant BRIAN JOHNSON, did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

COUNT TEN

On or about July 21, 2016, in the Northern District of Mississippi, defendant DANNY TURNER, a/k/a "Young", did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

Forfeiture Provision

The allegations contained in Counts One through Ten of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846 and/or Section 841, the defendants, KEITH WILLIAMS, a/k/a "Keke," DANNY TURNER, a/k/a "Young," BRIAN JOHNSON, COREY JOHNSON, a/k/a "Cool," MARQUEL MILES, a/k/a "Boo," JOSEPH WEEKS, CURTIN SMITH, ELANA GADDY, RACHEL PARTAIN, CONSTANCE MOORMAN, and ROOSEVELT WALTON, a/k/a "Ro" shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense[s] and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s).

The United States further reserves its right to seek forfeiture in the form of a money judgment against any of the defendants named herein in an amount equal to the illegal proceeds obtained by the defendants as result of the violations specified in this Indictment.

A TRUE BILL

Felipe C. Cordero
UNITED STATES ATTORNEY

/s/redacted signature
FOREPERSON